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October 16, 2018

VIA ECF

Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Keith Raniere, et al., 18 Cr. 204 (NGG)

Dear Judge Garaufis:

I represent the defendant Keith Raniere in above-captioned matter. On October 15, 2018, I appeared before the Honorable A. Kirke Bartley, Justice of the New York County Supreme Court, in the matter of People v. Dilber Kukic, et al., Ind. No. 74/2016. I explained to Justice Bartley that Your Honor has set a date for opening statements and trial in the Raniere case for March 18, 2019 preceded by jury selection. In light of the Government's statement that its direct case would last about four weeks and allowing for a possible defense case and holidays in April, Justice Bartley scheduled the Kukic case to proceed to trial on May 6, 2019. The District Attorney's Office estimates that the People's direct case will last three months. Therefore, the Kukic matter is likely to proceed until well into August 2019.

I advise Your Honor of this development for two reasons. First, as the Court is aware, it has ordered that no counsel in the Raniere matter shall schedule any matter for trial between January 1, 2019 and June 30, 2019, without permission of this Court. (See Dkt. No. 138, Order on Complex Case Designation at p. 3-4.) Therefore, this letter seeks permission to commence the Kukic trial according to the above schedule. Second, if the Court allows the undersigned to commence the Kukic on May 6, 2019, I would want this Court and all parties to know that the Kukic trial would last throughout the summer and would end likely in August 2019.

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I thank the Court for its attention to this matter.

Respectfully,



Marc Agnifilo

cc: All Counsel (via ECF)

Application denied.
As ordered.

s/Nicholas G. Garaufis

10/16/18 V